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STIPULATION, DECLARATION, AND ~~PROPOSED~~ ORDER EXTENDING DEADLINE FOR LEAD  
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS BY ONE WEEK

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

WILLARD A. SHARRETTE, DAVID  
GOLDMAN, and ESTA GOLDMAN,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

CREDIT SUISSE INTERNATIONAL, a  
foreign company, CREDIT SUISSE  
SECURITIES (USA) LLC, a Delaware  
limited liability company, and DOES 1-100,

Defendants.

Case No. 4:13-cv-02783-SBA

**STIPULATION, DECLARATION, AND  
~~PROPOSED~~ ORDER EXTENDING  
DEADLINE FOR LEAD PLAINTIFFS'  
OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS BY ONE WEEK**

Hon. Sandra Brown Armstrong

STIPULATION, DECLARATION, AND ~~PROPOSED~~ ORDER EXTENDING DEADLINE FOR LEAD  
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS BY ONE WEEK

1 WHEREAS, on December 5, 2013, this Court entered an order (ECF No. 43) appointing  
2 Willard A. Sharrette, David Goldman, and Esta Goldman as Lead Plaintiffs;

3 WHEREAS, on December 24, 2013, the Court entered an order (ECF No. 46) providing  
4 deadlines for which Lead Plaintiffs would be required to file an amended complaint, and by  
5 which Defendants would be required to answer or otherwise respond to the amended complaint;

6 WHEREAS, on February 3, 2014, Lead Plaintiffs filed a Consolidated Amended  
7 Complaint (ECF No. 48);

8 WHEREAS, on April 4, 2014, Defendants filed a Motion to Dismiss the Consolidated  
9 Amended Complaint (ECF No. 53);

10 WHEREAS, pursuant to the Court's December 24, 2013 order, Lead Plaintiffs are  
11 required to file any opposition to Defendants' Motion to Dismiss by June 3, 2014, and  
12 Defendants are required to file any reply in further support of their Motion to Dismiss by July 3,  
13 2014;

14 WHEREAS, Lead Plaintiffs requested that Defendants stipulate to a one-week extension  
15 of the deadline to file an opposition to Defendants' Motion to Dismiss, and Defendants agreed on  
16 the condition that the deadline to file Defendants' reply be pushed back by one week as well.

17 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by all parties through  
18 their respective counsel of record, that:

19 1. Lead Plaintiffs shall be granted a one-week extension to file an opposition to  
20 Defendants' Motion to Dismiss, from June 3, 2014 to June 10, 2014; and

21 2. The time for Defendants to file their reply in further support of their Motion to  
22 Dismiss will also be extended by one week, from July 3, 2014 to July 10, 2014.

1 STIPULATED AND AGREED TO:

2 DATED: May 29, 2014

SCOTT+SCOTT, Attorneys at Law, LLP

3 By: /s/ Thomas L. Laughlin IV

4 Thomas L. Laughlin IV

5 Deborah-Clark Weintraub

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24 *Counsel for Lead Plaintiffs*

25 DATE: May 29, 2014

LATHAM & WATKINS LLP

26 By: /s/ Allison S. Davison

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28 STIPULATION, DECLARATION, AND ~~PROPOSED~~ ORDER EXTENDING DEADLINE FOR LEAD  
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS BY ONE WEEK

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Pursuant to Local Rule 6-2, this Stipulation is supported by the following Declaration of Thomas Laughlin.

### DECLARATION OF THOMAS LAUGHLIN

I, Thomas Laughlin, declare:

1. I am an attorney at Scott+Scott, Attorneys at Law, LLP, counsel for Plaintiffs in this action. I have the principal responsibility for preparing Lead Plaintiffs' brief in opposition to Defendants' Motion to Dismiss. I make this Declaration in support of the parties' stipulation to extend the deadline for Lead Plaintiffs' opposition brief by one week.

2. This is the first request for an extension of time.

3. The parties have stipulated to this extension at my request. Although I have acted with due diligence, several other matters have required my immediate attention in recent weeks, including a bench trial ongoing in the District of Maine.

4. There is a case management conference presently scheduled for July 24, 2014 at 3:00 p.m. Defendants noticed the hearing for the Motion to Dismiss for July 15, 2014. Therefore, it does not appear that the requested extension will impact the schedule in this case.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on May 29, 2014 at New York, New York.

/s/ Thomas L. Laughlin, IV  
Thomas L. Laughlin, IV

PURSUANT TO THIS STIPULATION IT IS SO ORDERED.

DATED: 5/29/2014

*Saundra B. Armstrong*  
HON. SAUNDRA BROWN ARMSTRONG  
UNITED STATES DISTRICT JUDGE

STIPULATION, DECLARATION, AND ~~PROPOSED~~ ORDER EXTENDING DEADLINE FOR LEAD PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS BY ONE WEEK

**CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2014, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29th day of May, 2014 at New York, New York.

/s/ Thomas L. Laughlin IV  
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